

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755
Plaintiff,)	JUDGE WELLS
v.)	<u>JOINT MOTION FOR EXTENSION OF TIME TO OPPOSE MOTION TO COMPEL</u>
SAP AMERICA, INC., et al.)	
Defendants.)	

Plaintiff, Hodell-Natco Industries, Inc. and Defendants, SAP America, Inc. and SAP AG (collectively, “SAP”), by and through their undersigned attorneys and for the reasons set forth below, hereby request that the Court enter an order allowing SAP until March 26, 2012 to respond to Plaintiff’s motion to compel [Doc. 75]:

1. On February 24, 2012, Plaintiff filed a motion to compel [Doc. 75] SAP to provide supplemental responses to Hodell’s First and Second Requests for Production of Documents directed to SAP.
2. Under Rule 7.1(d), SAP’s response to Hodell’s complaint is due within 14 days of filing the motion, or by March 12, 2012.
3. The parties have recently requested a case management conference with the Court to discuss this motion and other outstanding issues. In light of that request, and in the hopes that the issues presented by Plaintiff’s motion may be resolved either during the case management conference or otherwise between the parties, counsel for SAP and counsel for Plaintiff seek a brief extension of time for SAP’s to respond to Plaintiff’s motion.

WHEREFORE, Plaintiff and SAP jointly request that this Court enter an order allowing SAP until March 26, 2012 to respond to Plaintiff’s motion to compel [Doc. 75].

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of March 2012, a copy of the foregoing Joint Motion for Extension of Time to Respond to Plaintiff's Motion to Compel was filed electronically. Parties may access this filing through the Court's electronic filing system.

/s/Leo M. Spellacy, Jr.
Leo M. Spellacy, Jr. (0067304)